

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SKYLINE SOFTWARE SYSTEMS, INC.

Plaintiff,

v.

KEYHOLE CORPORATION,

Defendant.

Civil Action No. 04-11129 DPW

**DECLARATION OF NOAH DOYLE IN SUPPORT OF
KEYHOLE CORPORATION'S MOTION TO TRANSFER VENUE**

1. I currently supervise strategic marketing at Keyhole. I make this affidavit in support of Keyhole's motion to transfer venue. I have personal knowledge of the following facts and could competently testify as to their truth.

2. I have been supervising strategic marketing at Keyhole for two (2) years.

3. In my capacity as supervisor of strategic marketing, I am responsible for managing Keyhole's marketing network, and distribution strategies and other marketing-related corporate management and planning activities. I am knowledgeable about the marketing of the accused products, the prices at which they are sold and could be sold, and the competitive forces in the marketplace that affect prices for both the accused products and Skyline's products.

4. In addition, I would also suffer personal hardship if I were required to travel to Massachusetts for court proceedings. I reside in Northern California. As a father of two young children, any time away from my family would result in personal hardship.

I declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct. Executed, this 1st day of November 2004, at Mountain View, California.


Noah Doyle